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6 *Attorneys for Movant Hsiu-Mei Yu*

7 **UNITED STATES DISTRICT COURT**

8 **NORTHERN DISTRICT OF CALIFORNIA**

9 DONALD RAMSEY, Individually and On
10 Behalf of All Others Similarly Situated,

11 Plaintiff,

12 v.

13 COINBASE GLOBAL, INC., BRIAN
14 ARMSTRONG, ALESIA J. HAAS,
JENNIFER N. JONES, SUROJIT
15 CHATTERJEE, PAUL GREWAL, MARC
L. ANDREESSEN, FREDERICK
16 ERNEST EHRSAM III, KATHRYN
HAUN, KELLY KRAMER, GOKUL
17 RAJARAM, FRED WILSON, AH
CAPITAL MANAGEMENT LLC,
18 PARADIGM FUND LP, RIBBIT
MANAGEMENT COMPANY, LLC,
19 TIGER GLOBAL MANAGEMENT, LLC,
UNION SQUARE VENTURES, LLC, and
20 VISERION INVESTMENT PTE LTD.,

21 Defendants.

Case No.: 3:21-cv-05634-VC

**[PROPOSED] ORDER GRANTING
MOTION OF HSIU-MEI YU FOR: (1)
CONSOLIDATION OF THE ACTIONS;
(2) APPOINTMENT AS LEAD
PLAINTIFF; AND (3) APPROVAL OF
SELECTION OF COUNSEL
AS MODIFIED**

Date: October 28, 2021

Time: 2:00 p.m.

Courtroom: 4-17th Floor

Judge: Hon. Vince Chhabria

1 GABBY KLEIN, Individually and on
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 COINBASE GLOBAL, INC., BRIAN
6 ARMSTRONG, ALESIA J. HAAS,
7 JENNIFER N. JONES, SUROJIT
8 CHATTERJEE, PAUL GREWAL, MARC
9 L. ANDREESSEN, FREDERICK
RAJARAM, and FRED WILSON,

10 Defendants.

Case No.: 4:21-cv-06049-YGR

11 MATTHEW CATTERLIN, Individually
12 and on Behalf of All Others Similarly
13 Situated,

14 Plaintiff,

15 v.

16 COINBASE GLOBAL, INC., BRIAN
17 ARMSTRONG, SUROJIT
18 CHATTERJEE, PAUL GREWAL,
19 ALESIA HAAS, MARC ANDREESSEN,
20 FREDERICK ERNEST EHRSAM III,
21 KATHRYN HAUN, KELLY KRAMER,
22 GOKUL RAJARAM, FRED WILSON,
AH CAPITAL, LLC, PARADIGM FUND
LP, RIBBIT MANAGEMENT
COMPANY, LLC, TIGER GLOBAL
MANAGEMENT, LLC, UNION
SQUARE VENTURES, LLC, and
VISERION INVESTMENT PTE LTD.,

24 Defendants.

Case No.: 4:21-cv-06149-YGR

Having considered the papers filed in support of the Motion of Hsiu-Mei Yu (“Movant”) for: (1) Consolidation of the Related Actions; (2) Appointment as Lead Plaintiff; and (3) Approval of Lead Counsel pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 77z-1(a)(3)(B), and for good cause shown, the Court hereby enters the following Order:

I. CONSOLIDATION OF RELATED ACTIONS

1. The above-captioned securities fraud class actions pending in this Judicial District are hereby consolidated for all purposes pursuant to Rule 42(a) of the Federal Rules of Civil Procedure. Any actions that have been filed, or may be filed, which are related and which may be considered herewith, are consolidated under Case No. 3:21-cv-05634-VC (the “Consolidated Action”).

2. A Master File is hereby established for the consolidated proceedings in the Consolidated Action. The docket number for the Master File shall be Master File No. 3:21-cv-05634-VC. The original of this Order shall be filed by the Clerk in the Master File. The Clerk shall mail a copy of this Order to counsel of record in each of the above-captioned actions.

3. Every pleading filed in the Consolidated Action shall bear the following caption:

IN RE COINBASE GLOBAL, INC. SECURITIES
LITIGATION

Master File No. 3:21-cv-05634-VC

II. APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL

4. Movant has moved this Court to be appointed as Lead Plaintiff in the Consolidated Action and to approve the counsel she retained to be Lead Counsel.

5. Having considered the provisions of Section 27(a)(3)(B) of the PSLRA, 15 U.S.C. § 77z-1(a)(3)(B), the Court hereby determines that Movant is the most adequate plaintiff and satisfies the requirements of the PSLRA. The Court hereby appoints Movant as Lead Plaintiff to represent the interests of the Class.

6. Pursuant to Section 27(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 77z-1(a)(3)(B)(v), Movant has selected and retained the law firm Levi & Korsinsky, LLP (“L&K”) to serve as Lead Counsel. The Court approves Movant’s selection of Lead Counsel for the Consolidated Action.

1 7. Lead Counsel shall have the following responsibilities and duties, to be carried out either
2 personally or through counsel whom Lead Counsel shall designate:

- 3 a. to coordinate the briefing and argument of any and all motions;
- 4 b. to coordinate the conduct of any and all discovery proceedings;
- 5 c. to coordinate the examination of any and all witnesses in depositions;
- 6 d. to coordinate the selection of counsel to act as spokesperson at all pretrial conferences;
- 7 e. to call meetings of the plaintiff's counsel as they deem necessary and appropriate from
8 time to time;
- 9 f. to coordinate all settlement negotiations with counsel for defendants;
- 10 g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial
11 and the trial of this matter, and to delegate work responsibilities to selected counsel as
12 may be required;
- 13 h. to coordinate the preparation and filings of all pleadings; and
- 14 i. to supervise all other matters concerning the prosecution or resolution of the claims
15 asserted in the Action.

16 8. No motion, discovery request, or other pretrial proceedings shall be initiated or filed by
17 any plaintiffs without the approval of Lead Counsel, so as to prevent duplicative pleadings or discovery
18 by plaintiffs. No settlement negotiations shall be conducted without the approval of the Lead Counsel.

19 9. Service upon any plaintiff of all pleadings, motions, or other papers in the Consolidated
20 Action, except those specifically addressed to a plaintiff other than Lead Plaintiff, shall be completed
21 upon service of Lead Counsel.

22 10. Lead Counsel shall be the contact between plaintiff's counsel and defendants' counsel,
23 as well as the spokespersons for all plaintiff's counsel, and shall direct and coordinate the activities of
24 plaintiff's counsel. Lead Counsel shall be the contact between the Court and plaintiff and his counsel.

25 **III. NEWLY FILED OR TRANSFERRED ACTIONS**

26 11. When a case that arises out of the subject matter of this action is hereinafter filed in this
27 Court or transferred from another Court, **the parties in this case shall file a motion to consider
28 whether the cases should be related, per Local Rule 3-12.**

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4 12. Each new case that arises out of the subject matter of the action that is filed in this Court
5 or transferred to this Court **and deemed related to this action** shall be consolidated with the
6 Consolidated Action and this Order shall apply thereto, unless a party objecting to this Order or any
7 provision of this Order shall, within ten (10) days after the date upon which a copy of this Order
8 is served on counsel for such party, file an application for relief from this Order or any provision
9 herein and this Court deems it appropriate to grant such application.

10 13. During the pendency of this litigation, or until further order of this Court, the parties
11 shall take reasonable steps to preserve all documents within their possession, custody or control,
12 including computer-generated and stored information and materials such as computerized data and
13 electronic mail, containing information that is relevant to or which may lead to the discovery of
14 information relevant to the subject matter of the pending litigation.

15 **IT IS SO ORDERED.**

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17 Dated: November 5, 2021

